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5 IN THE UNITED STATES DISTRICT COURT
6 FOR THE NORTHERN DISTRICT OF CALIFORNIA
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8 IN RE: UBER TECHNOLOGIES, INC.,
9 PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

10 This Document Relates to:

11 *Jaylynn Dean v. Uber Techs., Inc.*,
12 N.D. Cal. No. 23-cv-06708
13 D. Ariz. No. 25-cv-4276
14

**DECLARATION OF ROOPAL P.
LUHANA, ESQ. IN SUPPORT OF
PLAINTIFF'S OPPOSITION TO
DEFENDANTS' SECOND MOTION TO
STRIKE PLAINTIFF'S WITNESS AND
EXHIBIT LISTS**

Judge: Honorable Charles R. Breyer

1 I, Roopal P. Luhana, hereby declare as follows:

2 1. I am a partner of Chaffin Luhana LLP, an attorney licensed in the State of New
3 York and duly admitted to practice before this Court, representing Plaintiffs in the above captioned
4 action.

5 2. I submit this declaration in support of Plaintiff's Opposition to Defendants' Second
6 Motion to Strike Plaintiff's Witness and Exhibit List.

7 3. Plaintiff significantly reduced her Exhibit List by over 25% from her prior Exhibit
8 List.

9 4. The majority of the exhibits are Uber documents, deposition exhibits, or materials
10 relied upon by the parties' experts.

11 5. The examples of "incomprehensible" document descriptions Uber references in its
12 motion are the file names for those Uber documents.

13 6. Plaintiff's witness list consists of: (1) six experts that will be called live, (2) five
14 experts that may be called live, (3) three fact witnesses that will be called live, (4) two fact
15 witnesses that may be called live, (5) three additional unnamed fact witnesses that may be called
16 live (Custodian of Records, Sponsoring witnesses for Voluminous Material, Rep from FastTrack),
17 (6) two fact witnesses that will be called by video, (7) 24 fact witnesses that may be called via
18 video, (8) five fact witnesses that may be called but may appear live or by video, and (9) three fact
19 witnesses that will be called but may appear live or by video.

20 Executed this 5th day of January, 2026 in San Francisco, California.

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22 /s/ Roopal P. Luhana
23 Roopal P. Luhana
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